

A. REMARKS

No amendments to the application have been made in this reply. Hence, Claims 1-4, 6-14, 16-24 and 26-31 are pending in this application. All issues raised in the Office Action mailed October 14, 2003 are addressed hereinafter.

REJECTION OF CLAIMS 1-4, 6-14, 16-24 AND 26-31 UNDER 35 U.S.C. § 103(a)

Claims 1-4, 6-14, 16-24 and 26-31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ramsay et al.*, U.S. Patent No. 5,502,576 (hereinafter "*Ramsay*") in view of *Moon et al.*, U.S. Patent No. 6,408,338 (hereinafter "*Moon*"). It is respectfully submitted that Claims 1-4, 6-14, 16-24 and 26-31 are patentable over *Ramsay* and *Moon* because Claims 1-4, 6-14, 16-24 and 26-31 each include one or more limitations that are not in any way taught or suggested by *Ramsay* and *Moon*, taken alone or in combination.

CLAIM 1

Claim 1 recites a data storage apparatus that requires:

“an interface configured to receive digital data; and
a data processor communicatively coupled to the interface and being configured
to:
 automatically receive digital data from the interface and cause the digital
 data to be stored to a write-once-read-many (WORM) storage
 device,
 process a search query against the digital data stored on the WORM storage
 device, and
 in response to processing the search query against the digital data stored on
 the WORM storage device, generate data that identifies data stored on
 the WORM storage device that satisfies the search query.”

It is respectfully submitted that with respect to Claim 1, the data processor configured to “process a search query against the digital data stored on the WORM storage device” and “in response to processing the search query against the digital data stored on the WORM

storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query” is not in any way taught or suggested by *Ramsay* and *Moon*, taken alone or in combination. As set forth in the Office Action, *Ramsay* does not teach or suggest these limitations and *Moon* is relied upon for these limitations.

It is respectfully submitted that *Moon* does not teach or suggest a data storage apparatus with a data processor configured to “process a search query against the digital data stored on the WORM storage device,” as is required by Claim 1. The Office Action asserts that this limitation is taught by *Moon* at Col. 1, lines 17-23. The text at this portion of *Moon* describes an approach for reducing the time required to search packet data stored on a recording medium by generating additional information that is used during the search process. Although this text describes searching digital data stored on a recording medium and a recording and/or playback apparatus, there is no mention or suggestion of a write-once read many (WORM) storage device. Other portions of *Moon* describe other types of recording media, such as optical discs, but optical discs are not necessarily WORM devices unless specifically described as such. It is therefore respectfully submitted that *Moon* does not teach or suggest a data storage apparatus with a data processor configured to “process a search query against the digital data stored on the WORM storage device,” as is required by Claim 1.

It is further respectfully submitted that *Moon* does not in any way teach or suggest that the data processor is also configured to “in response to processing the search query against the digital data stored on the WORM storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query,” as is required by Claim 1. The Office Action asserts that this limitation is taught by *Moon* at Col. 3, lines 60-65).

The text at this portion of *Moon* describes generating basic unit information that includes arrival time information for packet data, specifically, the arrival time of a first packet of data in a basic unit. The basic unit information is stored on recording medium separate from the packet data and is used to reduce the amount of time required to search the packet data stored on the recording medium. Thus, *Moon* arguably teaches storing basic unit information data on the recording medium that assists in processing search queries against data stored on the recording medium. There is no mention or suggestion, however, of in response to processing a search query against the data stored on the recording medium, generating and storing data on the recording medium that identifies data stored on the recording medium that satisfies a search query. Furthermore, as described previously, there is no teaching or suggestion in *Moon* of doing this in the context of a WORM device. It is therefore respectfully submitted that the Claim 1 limitation of “in response to processing the search query against the digital data stored on the WORM storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query” is also not taught or suggested by *Moon*.

In view of the foregoing, it is respectfully submitted that Claim 1 includes one or more limitations that are not in any way taught or suggested by *Ramsay* and *Moon*, taken alone or in combination, and is therefore patentable over *Ramsay* and *Moon*.

CLAIMS 2-4 AND 6-11

Claims 2-4 and 6-11 all depend from Claim 1 and include all of the limitations of Claim 1. It is therefore respectfully submitted that Claims 2-4 and 6-11 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claim 1.

Furthermore, it is respectfully submitted that Claims 2-4 and 6-11 recite additional limitations that independently render them patentable over *Ramsay* and *Moon*.

CLAIMS 12-14 AND 16-21

Claims 12-14 and 16-21 include limitations similar to Claims 1, 3, 4 and 6-11, except in the context of a method for storing data. It is therefore respectfully submitted that Claims 12-14 and 16-21 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claims 1, 3, 4 and 6-11.

CLAIMS 22-24 AND 26-31

Claims 22-24 and 26-31 include limitations similar to Claims 1, 3, 4 and 6-11, except in the context of computer-readable media for storing data. It is therefore respectfully submitted that Claims 22-24 and 26-31 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claims 1, 3, 4 and 6-11.

In view of the foregoing, it is respectfully submitted that Claims 1-4, 6-14, 16-24 and 26-31 are patentable over *Ramsay* and *Moon*, taken alone or in combination, since each of these claims include one or more limitations that are not in any way taught or suggested by *Ramsay* and *Moon*. Accordingly, reconsideration and withdrawal of the rejection of Claims 1-4, 6-14, 16-24 and 26-31 under 35 U.S.C. § 103(a) as being unpatentable by *Ramsay* and *Moon* is respectfully requested.

It is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP



Edward A. Becker

Reg. No. 37,777

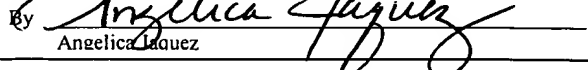
Date: January 14, 2004

1600 Willow Street
San Jose, CA 95125
(408) 414-1204
Facsimile: (408) 414-1076

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On January 14, 2004

By 
Angelica Laquez